

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar No. 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Telephone: (702) 388-6336
Facsimile: (702) 388-6787
E-mail: Virginia.Tomova@usdoj.gov
Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EMILIO ESTEVEZ,

Plaintiff,

v.

SAMANTHA POWER, Administrator of
the United States Agency for International
Development, LEILA EL GOHARY,
Executive Secretary, Office of the
Administrator United States Agency for
International Development, JASON M.
FRIERSON, United States Attorney for the
District of Nevada, MERRICK
GARLAND, United States Attorney
General, United States Department of
Justice, UNITED STATES
DEPARTMENT OF STATE, FOREIGN
SERVICE GRIEVANCE BOARD, Attn.
Katherine Kaetzer-Hodson, Executive
Secretary,

Defendant(s).

Case No. 2:23-cv-00846-RFB-MDC

**Stipulation to Extend Deadline to
Submit Defendant's Reply in Support of
Motion to Dismiss (ECF No. 21)**

(Third Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
this Court's Local Rules, the parties, through undersigned counsel, stipulate to a 30-days
extension, from March 18, 2024, to April 17, 2024, for Federal Defendants to file their
reply brief in support of the Motion to Dismiss (ECF No. 21). This is the third extension of
the reply deadline.

Plaintiff's counsel advises that he has withdrawn Plaintiff's Alternative Motion to

Amend First Amended Complaint and no response to the Motion is needed. *See* ECF Nos. 30, 34.

On March 8, 2024, both counsels conferred by email and agreed that due to their heavy workload an extension of 30 days will provide the necessary time for the Federal Defendants to file a reply in support of their Motion to Dismiss. Undersigned defense counsel has a settlement conference brief due on March 14, 2024, for a settlement conference in *Pina v. United States of America*, Case No. 2:22-cv-01946-ART-MDC, scheduled on March 21, 2024, Plaintiff's deposition and expert disclosures in another matter the week of March 18, 2024, and briefs, including a motion for summary judgment.

Accordingly, the parties, through undersigned counsel, stipulate and request that the Court approve a 30-days extension of time, from March 18, 2024, to April 17, 2024, for Federal Defendants to file their reply brief in support of the Motion to Dismiss (ECF No. 21).

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 11th day of March 2024.

MULLINS & TRENCHAK,
ATTORNEYS AT LAW

JASON M. FRIERSON
United States Attorney

/s/ Philip J. Trenchak
PHILIP J. TRENCHAK, ESQ.
Nevada Bar No. 9924
1614 S. Maryland Pkwy.
Las Vegas, NV 89104
Attorney for Plaintiff

/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney
Nevada Bar Number 12504
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Attorneys for the United States

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: March 12, 2024